

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
BEAUMONT DIVISION

RAFAEL PARKER,

Plaintiff,

v.

UNITED STATES OF AMERICA,

Defendant,

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CIVIL ACTION No. 1:20-CV-00444

JUDGE MARCIA CRONE
MAGISTRATE KEITH GIBLIN

**UNOPPOSED MOTION FOR LEAVE TO FILE UNDER SEAL PLAINTIFF'S EXHIBIT
A, TO PLAINTIFF'S OPPOSITION TO
DEFENDANT'S PARTIAL MOTION TO DISMISS**

Plaintiff Rafael Parker respectfully moves this Court to seal Exhibit A to Plaintiff's Opposition to Defendant's Partial Motion to Dismiss. Pursuant to the Stipulated Protective Order Governing Confidential Information ("Protective Order"), entered by the Court on January 25, 2021 [ECF No. 22], any party seeking to admit the Report of Investigation of the Office of Inspector General of the United States Department of Justice ("OIG Report") into evidence may move for it to be placed under seal. Subject to the Protective Order, Defendant provided Plaintiff with a copy of the OIG Report. In response to Defendant's Motion to Dismiss, Plaintiff seeks to submit a ten-page excerpt from the OIG Report in support of its opposition. The contents of the OIG Report are limited to Exhibit A and Plaintiff therefore seeks leave to submit Exhibit A under seal.

Dated: March 3, 2021

Respectfully submitted,

/s/ Aderson Francois

Aderson Francois

(D.C. Bar No. 498544, *pro hac vice*)

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Counsel for Plaintiff

CERTIFICATE OF CONFERENCE

Pursuant to Local Rule CV-7(h), I certify that I have conferred with Defendant, United States of America, who does not oppose this motion.

/s/ Marissa Hatton

Marissa Hatton
Georgetown University Law Center
Civil Rights Clinic

/s/ Zina Makar

Zina Makar
Georgetown University Law Center
Civil Rights Clinic

Counsel for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021 a true and correct copy of the foregoing document was filed electronically with the Court and has been served on counsel of record via the court's electronic filing system.

/s/ Marissa Hatton

Marissa Hatton

Georgetown University Law Center
Civil Rights Clinic

/s/ Zina Makar

Zina Makar

Georgetown University Law Center
Civil Rights Clinic

Counsel for Plaintiff